

Exhibit I

From: Werlwas, Mary Lynne [REDACTED]@legal-aid.org>
Sent: Thursday, October 20, 2022 12:07 PM
To: Joyce, Kimberly (Law) [REDACTED]@law.nyc.gov>
Cc: Jonathan S. Abady [REDACTED]; Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-NYC [REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa [REDACTED]; Sana Mayat [REDACTED]; Debbie Greenberger [REDACTED]; Anna Friedberg [REDACTED]; >; Hendy, Cherae [REDACTED]; Wolecki, Hilary [REDACTED]; >; Baranchuk, Victoriya [REDACTED]; Shechtman, Paul (DOC) [REDACTED]; >; Iodice, Ashley (Law) [REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW) [REDACTED]; >; 'Jeff Powell' [REDACTED]; Lynelle [REDACTED]; Maginley-Liddie, [REDACTED]
Subject: Follow-up to meet and confer on intake, death data

Kim,

We write to follow up to the meet and confer held this morning on the non-compliance and document request issues raised in our August 11 and August 26, 2022 notices.

This is to confirm that the City will inform plaintiffs whether you assert a "law enforcement" or other privilege as to to *all* the documents requested in our August 11 and September 16 letters, or whether you will produce a subset of the documents requested. We drew your attention particularly to your assertion of privilege over the documents concerning staffing in the jails, but ask that you advise if you have withdrawn your assertion of privilege as to any of the other August 11 and September 16 document requests. Please provide us with your position by Monday, October 24.

With respect to the dispute arising from our August 26 notice regarding intake, at the meet and confer this morning the City did not provide information on changed circumstances regarding intake overstay or the

falsification or unreliability of the tracking systems, nor dispute the serious concerns raised in that notice. If you have any such information, please provide it to us as well by Monday, October 24.

As noted at the meeting, we will write separately to provide you with dates of availability for meeting and conferring after October 28 on other disputes that may arise in connection with that report.

Mary Lynne

Mary Lynne Werlw
Director
Prisoners' Rights Project
Tel: [REDACTED]
she/her

